

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

*Plaintiff,*

-against-

SEAN COMBS, JUSTIN DIOR COMBS, LUCIAN  
CHARLES GRAINGE, KRISTINA KHORRAM,  
CHALICE RECORDING STUDIOS, LOVE RECORDS,  
MOTOWN RECORDS, UNIVERSAL MUSIC GROUP,  
COMBS GLOBAL ENTERPRISES, JOHN and JANE  
DOES 1-10 and ABC CORPORATIONS. 1-10,

*Defendants.*

Case No.: 24-cv-01457

**NOTICE OF MOTION TO  
DISMISS THE SECOND  
AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in support of this Notice of Motion to Dismiss the Second Amended Complaint dated April 12, 2024 (ECF No. 38) (“SAC”), the supporting Declaration of Donald S. Zakarin dated April 24, 2024, and the Declarations of Sir Lucian Grainge dated April 18, 2024, Martha Braithwaite dated April 18, 2024, and Ethiopia Habtemariam dated March 27, 2024 exhibited thereto and their respective exhibits, and all prior proceedings heretofore had and all papers filed herein, Defendants Sir Lucian Grainge, Motown Records and UMG Recordings, Inc., (the “UMG Defendants”) will move this Court, at a date and time to be determined by the Court, for Orders dismissing with prejudice all claims against them in Plaintiff Rodney Jones’ (“Plaintiff”) SAC pursuant to Federal Rules of Civil Procedure 8, 12(b)(2) and 12(b)(6).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Order of this Court (ECF No. 36), any opposing papers shall be filed within 21 days hereof, and any reply papers shall be filed within 14 days after the filing of Plaintiff’s opposition papers.

Dated: New York, New York  
April 24, 2024

**PRYOR CASHMAN LLP**

By: 

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